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Connect with the  
Bay Area Air District:



November 19, 2019

Hector Rojas, Senior Planner  
City of Pittsburg  
Community Development Department  
65 Civic Ave.  
Pittsburg, CA 94565

RE: K2 Pure Solutions Chlorine Rail Transportation Curtailment Project – Initial Study with Proposed Negative Declaration

Dear Mr. Rojas,

The Bay Area Air Quality Management District (Air District) staff has reviewed the Initial Study (IS) with Proposed Negative Declaration (ND) for the K2 Pure Solutions Chlorine Rail Transportation Curtailment Project (Project). The Project proposes to construct a new onsite chlorine rail loading station, vapor scrubber, and pipeline connecting to Pittsburg Dow Chemical (Dow). The proposed station would eliminate the need to import chlorine by rail from Texas by allowing K2 to load liquid chlorine into railcars stored onsite for Dow's use when the K2 facility is offline for maintenance or repairs.

We have identified Pittsburg as a priority community through our Community Air Risk Evaluation (CARE) program and, more recently, through our Community Health Protection Program. The Air District has worked for many years to improve air quality and health in Pittsburg, and these efforts continue today as we engage with the community to conduct air quality outreach, education, and advocacy to Pittsburg residents. Accordingly, increased air quality impacts in Pittsburg would be concerning.

Certain elements of the Project would require permits from the Air District. K2 Pure must apply for Air District permits (Authority to Construct/Permit to Operate) for at least the following prior to project construction:

- The new proposed liquid chlorine railcar loading operation equipped with a scrubber
- The new 130 horsepower diesel engine ("Trackmobile") used to move the loaded railcars from K2 Pure to the Dow off-loading terminal
- Any modification or alteration to liquid chlorine storage tanks
- Any new liquid chlorine storage tanks
- Any modification or alteration to Dow's liquid chlorine railcar off-loading operation

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The City of Pittsburg can direct K2 Pure to the Air District's ***Apply for an Authority to Construct/Permit to Operate*** webpage: <http://www.baaqmd.gov/permits/apply-for-a-permit>, or to their assigned BAAQMD permit engineer. The Engineering Division staff will evaluate the permit application and submitted information before taking final action on the permit.

If you have any questions regarding these comments, or would like to schedule a meeting, please contact Areana Flores, Environmental Planner, at (415) 749-4616, or [aflores@baaqmd.gov](mailto:aflores@baaqmd.gov).

Sincerely,



Greg Nudd  
Deputy Air Pollution Control Officer

cc: BAAQMD Director John Gioia  
BAAQMD Director David Hudson  
BAAQMD Director Karen Mitchoff  
BAAQMD Director Mark Ross